

REMARKS/ARGUMENTS

The Office Action objected to the title as not being descriptive. Accordingly Applicant has provided a new descriptive title.

Claims 1-24 are pending in the application. Claims 1-24 have been rejected. Claims 1 and 3-24 have been amended. These amendments were made for formal reasons only and should not be interpreted as narrowing the scope of the claims.

Claim Objections

The Office Action objected to claims 4-13 and 17-24 as being in improper form. Those claims have been amended so that each depends only on a single claim and are thus believed to be in proper form. Moreover, claim 24 has been amended to recite a program product counterpart to claim 14.

Rejections under 35 U.S.C. §112.

Claims 1-13 have been rejected under 35 U.S.C. §112, as being indefinite and more specifically because claim 1 recites the limitation "said object description" which allegedly has no antecedent. Applicant respectfully traverses that rejection and points out that the fourth element ("retrieving a second list") of claim 1 includes the term "an object." That term is the antecedent for "said object description."

Rejections under 35 U.S.C. §102.

The Office Action has rejected claims 1-24 under 35 U.S.C. §102 as being anticipated by U.S. Patent 5,752,243 issued to Reiter, et al (hereafter, "Reiter"). Applicant respectfully traverses the rejection for the following reasons.

Claim 14, as amended, relates to a method for persistently storing objects of an object-oriented environment established on a computer system having a volatile memory and a persistent storage, the method comprising steps of:

- allocating in said volatile memory, segments;
- creating a first list comprising first references to said segments;
- creating a second list comprising second references to blocks;

allocating a block of one of said segments,

creating an object description for an object by saving values owned by the object of the variables belonging to its class into said allocated block;

adding a new element to said second list containing the particular reference to said created object description;

determining the address of the object description of another object referenced in said object;

setting the address of said respective object description as the reference in the created object description;

storing said second list on said persistent storage;

storing the segments referenced by said first list on said persistent storage; and

storing said first list on said persistent storage.

Reiter relates to a method and structure for accessing multidimensional data in secondary storage (col. 2, line 66 – col. 3, line 3). Reiter neither teaches nor suggests the invention as claimed. The method of claim 14 requires the creation and storage (in persistent storage) of two lists: a segment map and an object map. The office action contends that the segment map corresponds to nodes in the B-tree and the object map corresponds to sub nodes. The claimed method does not build a tree so the analogy of a tree structure is not appropriate. Reiter appears to concern a method for storing objects that determines whether there is sufficient space for storage of the object and then follows one of two paths depending on whether there is enough space. The claimed invention does not concern the space availability issue; rather it specifies method steps once a determination has been made to store the object. The invention provides improved access to the stored objects by storing in persistent memory the first and second lists and by creating an object description that includes an address stored in persistent storage. Those steps are not found in the Reiter system. Specifically, the page 88 shown in figure 4 of Reiter includes neither a first or second list (segment map or object map) in the context of the claimed methods. The key values of Reiter are used to index tree nodes, not segments and the sub-node tables are used to index sub-nodes in the tree. See Abstract.

The office action contends that figure 5 of Reiter shows the claimed creation of an object

description. Applicant respectfully traverses this conclusion. For example, consider that Reiter's figure 5 is a block diagram of illustrative data stored in nodes and sub-nodes of a Multidimensional B-tree, not object descriptions as required by claim 14.

Reiter also fails to teach or suggest adding a new element as claimed. The office action contends that figure 8A of Reiter relates to this claim element but that flow chart relates to a method for determining whether a unit of data fits in a node of the tree structure of Reiter. That is not the same as the claimed element of adding a new element.

Claims 15-23 are either directly or indirectly dependent on claim 14 and are patentable for at least the same reasons that claim 14 is patentable. Claim 24, as amended, is a computer program product counterpart of Claim 14 and is not anticipated by Reiter for the foregoing reasons.

For the foregoing reasons, Applicant respectfully requests allowance of the pending claims and that a timely Notice of Allowance be issued in this case.

Respectfully submitted,


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I hereby certify that this Amendment and Response to Office Action, and any documents referred to as attached therein, are being deposited with the United States Postal Office with sufficient postage as first-class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450.

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